PUBLIC STATEMENT OF DIANE BURTON

MS. BURTON: Good morning. My name, for the record, is Diane Burton. I don't want to offend anybody with my first statement, but -- so I'll attribute it to Kai Erickson (phonetic) who is a professor at Yale. He is the source of it. He said the -- he thought the appropriate response to the concept of thinking about a 10,000-year period wherein we can assure something will or will not happen, the appropriate response would be: Holy shit, that's a long time.

1 I think there's real problems with the concept that we can, in fact, assure anything for a 10,000-year period. Particularly when we have situations where we have not even calculated the socio-economic cost associated with an accident because the data in the computer model is outdated. It should be updated. Those calculations should be made before you go forward. I find a lot of the information in the environmental impact statement -- and I've reviewed most of it -- to be wholly inadequate at this point.

2 There is no discussion of socio-cultural analysis. The Nuclear Regulatory Commission for low-level radioactive waste disposal requires socio-economic analysis and states that socio-cultural analysis may also be appropriate; and that in cases where it is appropriate, that attitudinal surveys should be performed during site characterization. None of this has been done with respect to the Yucca Mountain project.

Socio-cultural dimensions would include community cohesion, family stability, local attitudes and lifestyles, and prevailing community problems. When you're faced with a controversial project, which I think all of us acknowledge this is, public perception becomes very important. People perceive there to be danger involved with this. They will act upon their perceptions regardless of what the risk probabilities show. So it's important to get these kind of things done. They have not done any of those kind of studies and analysis. They need to be done before anything -- any decision is made.

3 We have discussion of the concept of human error. In Appendix J, I find the analysis of the potential for human error to be wholly inadequate in that they write it off as a potential of a problem because we have Department of Transportation and Nuclear Regulatory Commission regulations, and those will address any potential for human error.

I think we've discovered in our recent lifetime in the past 20 years -- and remember, we're talking about assurances for 10,000 years with respect to this project -- that human error does occur. It occurred in the Challenger, it occurred in the Exxon Valdez. The odds of those two events occurring were less likely when -- than what they represent the odds of a worst-case accident occurring with respect to transportation.

6 Another thing I'd like to point out is that while you look at, for routine accidents, there being a 1 in 100,000 chance of one occurring, and for worst-case scenario accidents there being a 1 in 10 million chance of them occurring, most people who do risk assessment and probability analysis acknowledge that there's a factor of 10 for uncertainty that needs to be included.

If you include that, you're looking at, rather than 1 in 100,000 chance, you're looking at 1 in 10,000 chance. You're looking at, instead of 1 in 10 million chance, you're looking at a 1 in a million chance. Those kind of things need to be considered.

4... Once again, I will acknowledge, arguendo, that the likelihood of an accident are -- a major worst-case scenario accident are, in fact, low; however, the consequences of it are very, very high. We're dealing with casks that, to my knowledge, have not been completely designed yet; that the intention is to test these casks using computer modeling. The cask should -- once designed and approved for shipment, should be

...4 tested in the real world, not just by computer modeling so that we have some real data to go on. Computers are fun, but I don't think you get enough information for something that has potential consequences as severe as these.

5 The environmental impact statement states that since it's more than ten years prior to any shipments occurring that the specific routes have not been delineated and will not be delineated until approximately four years prior to shipment.

In order for states and localities to access funds for providing training and getting proper equipment for responding to any accidents, much less a worst-case scenario accident, the Department of Energy, by statute, has to designate what those transportation routes will be.

I think they are remiss in not designating the routes now so that we can be assured that all emergency responders -- and in the case of the state of Nebraska where the majority of the miles will be through rural areas where the responders would be volunteers. We don't have fire departments in most of the rural towns along the transportation route. We have volunteers -- we owe it to them to assure that they are trained now and that they have training updates from now on prior to this occurring.

I think we can be reasonably assured given that the major transportation routes in this country for commercial items as well as for illicit items is I-80, that the traffic route to be designated in -- at some future time will, in fact, be I-80 through Nebraska. They need to designate that route officially so that the citizens of Nebraska can have the benefit of getting access to the funds to train their people.

And I -- I think that's all. Thank you.